

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appl. No.: 10/820,442 Confirmation No.: 7157
Appellant(s): Mikko Makela
Filed: April 7, 2004
Art Unit: 2175
Examiner: Andrew L. Tank
Title: PRESENTATION OF LARGE PAGES ON SMALL DISPLAYS

Docket No.: 042933/378783
Customer No.: 00826

Mail Stop Appeal Brief-Patents
Commissioner for Patents
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REPLY BRIEF UNDER 37 CFR § 1.193(b)(1)

This Reply Brief is filed in response to the "Examiner's Answer" mailed on December 20, 2010 which was received in response to the "Appeal Brief" filed September 20, 2010, which was responsive to the Final Office Action dated January 7, 2010 ("the Final Office Action"). This Reply Brief addresses various points raised by the Examiner's Answer.

7. Appellant's Arguments

As explained in the Appeal Brief, independent Claims 1, 15, 32, and 37, and their respective dependent claims, are patentably distinct from Chen, Y., Ma, W.J., and Zhang, H.J. "Detecting Web Page Structure for Adaptive Viewing on Small Form Factor Devices," *Proceedings of the 12th international conference on World Wide Web (WWW 2003)*, May 20-24, 2003, Budapest, Hungary (hereinafter "Chen"). Accordingly, Appellants respectfully request that the aforementioned rejection be reversed.

In reply to the Examiner's Answer, Appellants again submit that the cited reference fails to teach or suggest the recited features of the claims. The Examiner's Answer, in large part, repeats the same recitations used in the final Office Action in rejecting the currently pending claims. As such, Appellants respectfully submit that since the Appeal Brief points out the flaws

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in the Examiner's reasoning with respect to these rejections, no further discussion of the issues previously addressed in the Appeal Brief need be presented herein. Rather, Appellant will direct the comments presented herein toward responding to specific assertions from the "Response to Argument" section of the Examiner's Answer (pages 7-8).

10. In Reply to Examiner's Response to Argument (Item 10).

Appellants submit that arguments provided in the Appeal Brief are not overcome by the responses included in the Examiner's Answer. Appellants provide the following to further address some of the arguments at issue in this appeal.

As previously outlined, Claim 1 recites, *inter alia* "wherein said at least partially dividing at least one page into a plurality of areas comprises element-wise rendering elements contained in said at least one page to obtain a rendered object with a maximum height and a maximum width, checking if a size of said rendered object exceeds a threshold, and **forming an area from said rendered object if said threshold is exceeded[.]**" Emphasis added. The Examiner's Answer alleges that Chen discloses the above features, and cites in particular Chen, page, 3, section 3.2.1 which recites "[a] pair of thresholds (one for width and the other for height) is used to determine whether a node is small enough. If the node exceeds the thresholds, it will be split further." Applicant asserts that "forming an area from said rendered object if said threshold is exceeded" is not equivalent to "splitting the node further" as recited by Chen. Paragraph [0077] defines "forming an area" with reference to the flowchart of FIG. 7, reciting:

In step 703 (and also in step 702), when forming an area (i.e., calculating the display area in pixels that the area would take), table areas having no information content (no text, no images, no input fields, or similar) may not be taken into account (i.e., may not be included into formed area). In other words, within tables, areas are formed according to information content in the order which the information content appears in the HTML page source code (e.g., HTML, XHTML, or similar source code).

Conversely, Chen "splits the node further" if height and width thresholds are exceeded. Chen outlines the "splitting" of nodes in section 3.2.1 reciting a procedure using an HTML DOM tree that uses the "position and dimension information for each node in the DOM tree." The selection and splitting of nodes is performed exclusively based upon dimensional and positional factors.

Chen recites in section 3.2 “For any given content, we can decide which block it should belong to by analyzing the position and shape of the region it occupies. For instance, content in header and footer usually has a flat shape (i.e., small height/width ratio), while header content locates on the top of a web page and footer content locates on the bottom.” The “splitting” of nodes is performed only to obtain a node that meets the dimension and position criteria of one of the five high-level blocks including “header”, “footer”, “left side bar”, “right side bar”, and “body”. See Figure 5. Chen completely disregards the information content such that areas are not formed according to information content as “forming an area” of the present claim is defined.

Claim 1 further recites “checking if at least one edge of said formed area is not straight, and forming a smaller area from said rendered object if at least one edge is not straight.” The Examiner’s Answer alleges on page 8 that “Chen discloses the use of a straight line to check which area belongs in which category as a method of further splitting areas.” Appellant asserts that “checking if at least one edge of said formed area is straight” is not equivalent to Chen’s “use of a straight line to check” whether a node exceeds the “threshold N.” Chen only addresses nodes with rectangular shapes and does not address the possibility that a node may not have an edge that is not straight. In addition, the shape of a node would be inconsequential in the “straight line check” described by Chen. If the node is below the threshold N in FIG. 6(a) of Chen, the node will not be classified as a “header block,” regardless of what shape or how much of the node extends below the threshold N. Thus, Chen’s “straight line check” is clearly distinct from the claimed feature of “checking if at least one edge of said formed area is not straight,” much less the further feature of “forming a smaller area from said rendered object if at least one edge is not straight.”

For at least the reasons above, the Examiner’s Answer does not overcome the arguments presented in the Appeal Brief and Chen does not teach all of the features of Claim 1 nor are these features obvious in light of the teachings of Chen. Therefore, Claim 1 is patentably distinct from Chen and is in condition for allowance. Each of Claims 15, 32, and 37 recite similar features as those discussed with respect to Claim 1 and were rejected together in the Office Action. Thus, in

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view of the arguments with respect to Claim 1, each of Claims 15, 32, and 37 is patentably distinct from Chen and is similarly in condition for allowance.

The Rejection of the Dependent Claims is Overcome

Because each of the dependent claims includes each of the recitations of a respective independent base claim, Appellant further submits that the dependent claims are patentably distinguishable from the cited references, taken alone or in combination, for at least those reasons discussed above. Accordingly, applicants respectfully submit that the rejections of the dependent claims are overcome and the dependent claims are in condition for allowance.

CONCLUSION

In light of the remarks presented herein, Appellant submits that Claims 1, 14, 15, and 25-41 are patentable and the rejections should be reversed.

Respectfully submitted,

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